

**IN THE UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF INDIANA**  
**SOUTH BEND DIVISION**

IN THE MATTER OF:

CASE NO. 16-31400

Donald Allen King  
Debtor

CHAPTER 13

**SPRINGLEAF FINANCIAL SERVICES OF INDIANA, INC.'S**  
**RESPONSE TO TRUSTEE'S CLAIM OBJECTION**

Comes now Springleaf Financial Services of Indiana, Inc. (Springleaf), by counsel, and by way of response to the trustee's objection states:

1. In their Motion for Relief Springleaf stated the NADA value for the vehicles. At that time Springleaf did not have any further information regarding the condition of the vehicles.
2. It would cost Springleaf a minimum of \$525.00 per vehicle to take possession of them and move them to an auction site to liquidate them.
3. Certainly at an auction Springleaf is going to have to pay costs of the auction (plus the aforementioned \$525.00 fee) before realizing any proceeds.
4. An auction is not likely to generate anywhere near the NADA value of the vehicle.
5. Springleaf is not in the business of retail sales of vehicles so has no sales lot at which they could sell the vehicles for the presumed retail price.
6. Springleaf estimates that the Jeep, at auction, would not sell for enough to cover the \$525.00 repo fee and auction fees.

7. Springleaf estimates the Dodge Neon, at auction, would not sell for enough to cover the \$525.00 repo fee and auction fees.
8. So in essence if Springleaf were required to repo and sell the vehicles they would cost the estate money as their deficiency claim would actually be larger than the current proof of claim.
9. If the Trustee has a mechanism by which they can take possession of the vehicles and sell them at a price that generates a net positive cash flow, Springleaf is more than willing to enter into negotiations with the Trustee to make that happen.

Wherefore Springleaf prays this Court to deny the Trustee's objection to their Proof of Claim and for all other just and proper relief.

KRISOR & ASSOCIATES

By: /s/Brooks J. Grainger  
Brooks J. Grainger, (19362-71)  
Attorney for Creditor  
P.O. Box 6200  
South Bend, IN 46660-6200  
Ph: (574) 272-1000  
Fax: (574) 272-4303  
bgrainger@krisorlaw.com

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served upon Donald Allen King, 401 S. Deer Creek Street, Lot 29, Galveston, IN 46932 via First Class Mail, and upon Fatima A. Skimin, 101 West Ohio St., Suite 2000, Indianapolis, IN, 46204, Debra Miller, P.O. Box 11550, South Bend, IN, 46634, and U.S. Trustee, One Michiana Square, 5<sup>th</sup> Floor, 100 East Wayne St., South Bend, In. 46601, via electronic mail, on December 19, 2016.

/s/Brooks J. Grainger  
Brooks J. Grainger